

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

CONNECTU LLC,

Plaintiff,

v.

MARK ZUCKERBERG, EDUARDO SAVERIN,
DUSTIN MOSKOVITZ, ANDREW MCCOLLUM,
CHRISTOPHER HUGHES, and THEFACEBOOK,
INC.,

Defendants.

CIVIL ACTION NO. 1:04-CV-11923
(DPW)

MARK ZUCKERBERG, and THEFACEBOOK,
INC.,

Counterclaimants,

v.

CONNECTU LLC,

Counterdefendant,

and

CAMERON WINKLEVOSS, TYLER
WINKLEVOSS, and DIVYA NARENDRA,

Additional Counterdefendants.

**ASSENTED TO MOTION FOR LEAVE TO FILE FACEBOOK DEFENDANTS' REPLY
TO PLAINTIFF'S OPPOSITION TO MOTION TO COMPEL PARTICULARIZED
IDENTIFICATION OF TRADE SECRETS IN RESPONSE TO THE FACEBOOK
DEFENDANTS' INTERROGATORY NO. 2**

Defendants Mark Zuckerberg, Dustin Moskovitz, Andrew McCollum, Christopher Hughes, and TheFacebook, Inc.¹ (“The Facebook Defendants”) hereby move for leave to file a reply to Plaintiff’s Opposition to Motion to Compel Particularized Identification of Trade Secrets in Response to the Facebook Defendants’ Interrogatory No. 2.

This motion is necessary to address new issues raised in Plaintiff’s Opposition and to clarify the record for the Court. Plaintiff’s Opposition contains numerous legal and factual errors which must be corrected. New issues raised in the Opposition include new arguments by Plaintiff relating to secrecy of matter designated, as well as issues relating to numerous new factual assertions.

The Facebook Defendants’ reply (Exhibit A) will clarify these issues and will assist the Court in ruling on the Facebook Defendants’ Motion to Compel Particularized Identification of Trade Secrets in Response the Facebook Defendants’ Interrogatory No. 2.

CERTIFICATION PURSUANT TO LOCAL RULE 7.1

Counsel for the Facebook Defendants certifies that pursuant to Local Rule 7.1, the parties have conferred regarding the issues presented by this motion, and that counsel for Plaintiff ConnectU (Troy E. Grabow) and for Defendant Eduardo Saverin (Robert Hawk) each consent to this motion.

¹ Defendant Eduardo Saverin is represented by separate counsel in this matter.

Dated: September 27, 2005.

Respectfully submitted,

/s/ Joshua H. Walker

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THEFACEBOOK, INC.

* Admitted Pro Hac Vice

CERTIFICATE OF SERVICE

I hereby certify that on September 27, 2005, a true and correct copy of the foregoing document was served on counsel of record by use of the Court's ECF system.

[[/s/]] Joshua H. Walker

Joshua H. Walker*

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